

March 29, 1995

Paula Bisson Carl
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Chevron

HIT 160 010 005
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Mr. Jeffrey Zelikson
Director - Hazardous Waste Management Division
U. S. Environmental Protection Agency
Region IX
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**CHEVRON HAWAII REFINERY
CORRECTIVE MEASURES STUDY- BACKYARD AREA**

Dear Mr. Zelikson:

In response to your letter of December 21, 1994, we are providing our plan for a Corrective Measures Study for the Backyard Area herein. Our plan addresses the issues you raised in your letter, as well as additional information and comments. We have previously responded on the Land Farm issues included in your December 21 letter (See our Letter dated 1/13/95; R.L. Roberts to P. Bisson), and are making progress in the design of an upgradient free phase recovery system.

Plan for Corrective Measures Study- Backyard Area

We agree that ongoing free phase recovery and plume monitoring upgradient of the ocean is necessary to ensure protection of the local surface waters. We will incorporate both these items in our Corrective Measures Study. Please also be aware that we continue to make operational adjustments to our existing Backyard recovery system to maximize the recovery of free phase hydrocarbon. As you may recall, our recovery system began operations around 1988. In 1992, the system was substantially lengthened with the addition of nine more recovery wells (RW 39 - 46, and RW 1). We have field personnel dedicated to the ongoing operation of this system and its optimization. Our field records indicate that we have recovered, on average, about 58,500 gallons of free phase /water mixture (oily waters) annually since 1992.

We propose that the Corrective Measures Study for the Backyard incorporate the following elements, and will implement this plan upon your approval:

- Ongoing passive recovery of free phase hydrocarbon from wells RW14 through RW46 (implemented)

- Monitoring to detect free and dissolved hydrocarbon migrating toward the west (oceanside): We propose sampling four downgradient wells twice a year for TPH. Proposed sampling wells are R1, R6, R37, and Observation Well 32. Additionally we would visually inspect, quarterly, nine downgradient wells; R1-7, Observation wells 31 and 32.

If, at any time, TPH levels exceed background levels, we would take an additional TPH sample within 14 days of receipt of the analytical (exceedence) results. If well analytical results show two consecutive TPH exceedences, we would immediately initiate *weekly* visual inspections at all wells in, and directly adjacent to, the local area of concern. This enhanced monitoring would continue until corrective action is implemented and/or the TPH levels return to their background levels. We would also undertake *corrective action if free product is observed at any time*. See below contingency plan for proposed corrective action.

- To mitigate plume migration and protect our surface waters, we propose a contingency plan of immediate recovery of any observed free phase product. Techniques we would employ here include direct recovery from a well casing, installation of a 'local' passive recovery system, etc.

We would, however, feel more certain of this approach with additional field data. As you know, we have scheduled installation of our Land Farm recovery trench by 3Q95, and believe that this system will yield relevant performance data that may be applicable to the Backyard. With this in mind, we will revisit these proposed contingency plans after observing operation of the Land Farm system.

- Based on the data we have today, we fully expect our recovery operations will continue into the near (say 5 years) future. As you know, this area has a relatively flat site gradient subject to tidal fluctuations, as well as underground channels, solution features, and potential intermixing of upgradient site plumes. These features combine to make estimating Backyard recoverable product difficult. We have data documenting the gross levels of free product in the Backyard, however, we would like to complete additional site plume delineation prior to submitting a quantitative estimate.

Other Clarifications and Comments

- * As we have consistently maintained, we do not agree that the Oily Sewer System is a SWMU. We also note that neither the Oily Sewer System or the Backyard plume, are indicated as SWMU's requiring corrective action in our permit. As demonstrated in the past, we are willing to undertake appropriate actions on a voluntary basis. We are committed to conducting the above described work on that basis without requiring EPA to use the permit modification process to require a CMS. As you are aware, the regulatory

process and subsequent appeals may significantly delay the onset of investigative and remedial activities.

More importantly, EPA should be aware that Chevron had, on its own, targeted both the Backyard Area and upgradient sections of the site for additional assessment in 1995-96. Following this work and the operation of our new Land farm recovery system, we will reevaluate the effectiveness of the existing Backyard recovery system. Chevron feels that proceeding with this work as described will allow for more innovative field approaches to be considered, and will expedite field action. We would like to discuss this approach with you in more detail at your convenience, and will begin our Consultant selection process for this assessment work shortly.

Please contact Patricia Wagner at (415) 894-0929, if we can be of further assistance.

A handwritten signature in cursive script, appearing to read "R. L. Roberts".

R. L. ROBERTS

Attachment

cc: C. Warren, EPA
S. Chang, HDOH

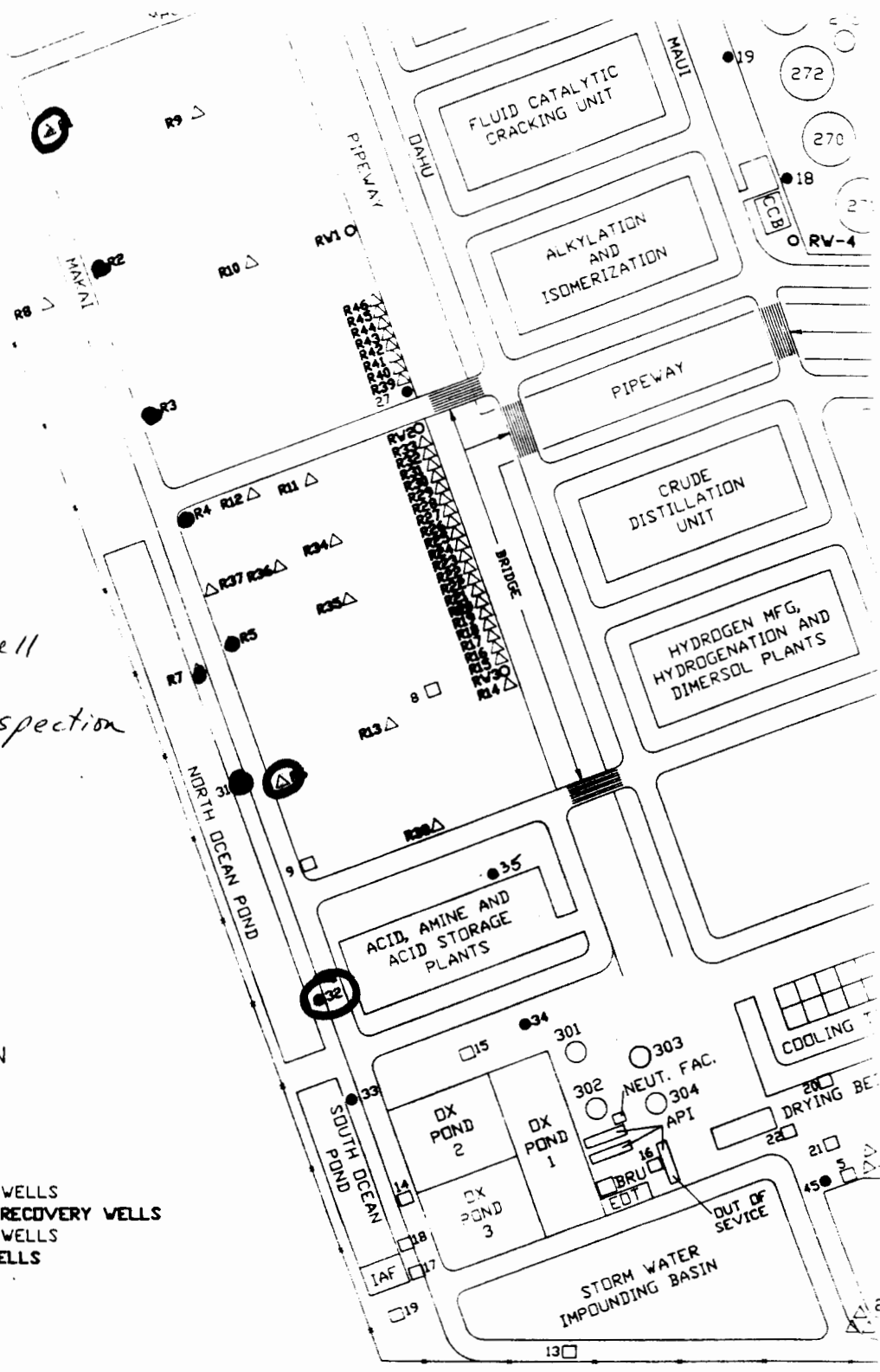
Sampling Well
 Visual Inspection



PACIFIC OCEAN

KEY

- - 2" OBSERVATION WELLS
- △ - 8" OBSERVATION RECOVERY WELLS
- - 4" OBSERVATION WELLS
- - 24" RECOVERY WELLS



ENGINE DRAWINGS				NOTES	
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